Arkansas Steel Associates, LLC

ASA

2803 Van Dyke Road Newport, Arkansas 72112 U.S.A. Tel. No. (870) 523-3693 Fax. No. (870) 523-4619

January 4, 2012

Environmental Protection Agency Office of Federal Activities International Compliance Assurance Division (2254A) 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

CERTIFIED MAIL #7009 0820-0000-6642-7731

ATTENTION:

Hazardous Waste Exports

Gentlemen:

The purpose of this letter is to comply with 40 CFR 262.56 and 262.87(a) Annual Reporting, and offer the following information as requested:

Exporter

1) Arkansas Steel Associates, L.L.C.
Facility ID# ARD091691261
2803 Van Dyke Road
Newport, Arkansas 72112

Calendar Year

2) Calendar year covered by this report, 2011

3) Zinc Nacional, S.A. Serafin Pena Sur 938 Monterrey N.L. Mexico 64000

Waste Description

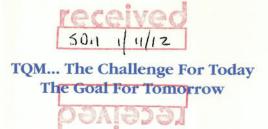
4) Flue dust, Iron or Steel containing
Recoverable zinc. EPA Hazardous Waste
Code K-061 DOT Hazard Class ORM-E UN
3077, Class 9, PGIII, ERG #171, U.S. EPA
ID# of transporter, NED001792910, (U.P.
Railroad). Total amount of waste shipped in
2011 8,329,000 lbs. and total number of

shipments were 49.

5) Toxicity has not changed as compared to previous years. 2008 average zinc content was 20.72%. 2009 average zinc content was 16.86%. 2010 average zinc content was 20.73%. 2011 average zinc content was 18.23%.

Toxicity Volume

Foreign Consignee



Arkansas Steel Associates, LLC

2803 Van Dyke Road Newport, Arkansas 72112 U.S.A.

EPA Mail

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To: Federal Activities

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Department: **YP9ZZ**

Certified PKG Condition Phone:

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International Compliance Assurance Division (2254A)

Environmental Protection Agency

1200 Pennsylvania Avenue, N.W.

Office of Federal Activities

Washington, D.C. 20460

Ariel Rios Building



TELL 2499 0000 0280 6001

Hazardous Waste Exports Page 2

Toxicity

Volume

Certification

Sincerely,

Billy E. Ferguson
Manager, Environment

Toshinori Nakinishi

President

cc: Ar. Dept. of Environmental Quality

Hazardous Waste Division 5301 Northshore Drive

North Little Rock, AR 72118-5317

Certified Mail #7009-0820-0000-6642-7724

These slight changes occur due to variations in the scrap (raw material) mix in the melting process of steel.

Volume has increased by 1,569,800 lbs. in 2011, as compared to 2010, K-061 flue dust is generated through the normal production process of steel in electric arc furnaces and controlled solely by production demands of steel facilities products.

No efforts were undertaken to reduce the volume of toxicity as there is no technology currently known to achieve this; however, recycling the material has been chosen as the most environmentally sound method available to Arkansas Steel Associates, L.L.C.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information, is true and accurate, and complete. I am aware that there are significant penalties for submitting false information including possibility of fine and imprisonment.

Toshinori Nakinishi President, A.S.A., L.L.C.